

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

SIR EDWARD THOMAS, SR.,

Plaintiff,

v.

CORRECT CARE SOLUTIONS, LLC,

Defendant.

)
)
)
)
)
)
)
)
)
)

Case No. 3:14-cv-581-REP

MOTION TO DISMISS WITHOUT PREJUDICE PURSUANT TO FED. R. CIV. P.
41(a)(1)(A)(ii) AS TO CORRECT CARE SOLUTIONS, LLC

COMES NOW Plaintiff, by counsel, moving this Court to dismiss this case without prejudice. The defense has agreed to the terms of this motion and has so indicated in the attached STIPULATION OF DISMISSAL WITHOUT PREJUDICE as to all counts against Defendant Correct Care Solutions, LLC. Each party shall bear their own fees, costs and expenses.

Respectfully submitted,

SIR EDWARD THOMAS, SR.

/s/

David P. Morgan
davidm@mrslawfirm.com
MARCARI RUSSOTTO
SPENCER & BALABAN, P.C.
1 Park West Circle, Suite 101
Midlothian, VA 23114
Telephone: 804.307.6584
Counsel for Plaintiff

CERTIFICATION

I certify that a copy of this Motion to Dismiss and the accompanying Stipulation to Dismiss without prejudice has been served on all parties to this action by this Court's ECF/NEF system.

/s/

David P. Morgan
davidm@mrslawfirm.com
MARCARI RUSSOTTO
SPENCER & BALABAN, P.C.
1 Park West Circle, Suite 101
Midlothian, VA 23114
Telephone: 804.307.6584
Counsel for Plaintiff